Exhibit G

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UNITED STATES BANKRUPTCY COURT

Attorneys for Autoliv ASP, Inc.

DPH HOLDINGS CORP, et. al.,

SOUTHERN DISTRICT OF NEW YORK		
	X	
In re:	:	Chapter 11
	:	

Case No. 05-44481-RDD

Reorganized Debtors. :

AFFIDAVIT OF DANA WOLD IN SUPPORT OF AUTOLIV ASP, INC'S RESPONSE TO THE REORGANIZED DEBTORS' FORTY-SEVENTH OMNIBUS-OBJECTION PURSUANT TO 11 U.S.C. §503(b) AND FED R. BANK. P. 3007 TO (I) DISALLOW AND EXPUNGE CERTAIN ADMINISTRATIVE EXPENSE BOOKS AND RECORDS CLAIMS, (B) A CERTAIN ADMINISTRATIVE EXPENSE DUPLICATE CLAIM, AND (C) CERTAIN ADMINISTRATIVE EXPENSE DUPLICATE SUBSTANTIAL CONTRIBUTION CLAIMS, AND (II) MODIFY CERTAIN ADMINISTRATIVE EXPENSE CLAIMS ("FORTY-SEVENTH OMNIBUS CLAIMS OBJECTION")

- 1. If called as a witness, I am competent to testify to the facts contained in this Affidavit and these facts are true.
- 2. This Affidavit is submitted in support of the Autoliv ASP, Inc's ("<u>Autoliv</u>") Response to the Debtors' Forty-Seventh Omnibus Claims Objection.
 - 3. I have been employed by Autoliv as an engineer since September 1997.
- 4. From approximately April 2006 though April 2010, I was a member of Autoliv's development group for side and curtain airbags.

- 5. In April 2010, I was promoted to Principal Engineer for Side and Curtain Airbags at Autoliv.
- 6. My job responsibilities at Autoliv include creating designs for curtain and side airbags for new programs, products and automobiles.
- 7. I am familiar with and have reviewed the patents that are the subject of Autoliv's administrative claim, including without limitation (collectively, the "Patents"): (1) US Patent 5,788,270; (2) US Patent 6,623,031; (3) US Patent 6,494,480; (4) US Patent 6,099,029; and (5) US Patent 6,402,192.
- 8. The Patents relate to Autoliv's side impact inflatable curtain airbags. Two types of inflatable curtains are used in the side impact inflatable curtain airbags. One type is designed to absorb the energy of a direct side impact. The other type of curtain is used to provide energy absorption for up to six seconds in roll-over crashes.
- 9. The inflatable curtains are stored in the headliner above the automobile's doors. When deployed, the cells of the inflatable curtain are inflated in less than 25 milliseconds. The inflation makes the curtain deploy in the passenger compartment, providing protection between the occupant's head and any hard objects.
- 10. The core feature to the side impact inflatable curtain airbags is their contour. There are two lawyers of fabric that are connected with the periphery of the fabric. The contour forms an inflatable space within the two fabric layers. Within the periphery there are also connection points that form the contour of the side impact inflatable curtain airbags.
- 11. The following products manufactured by the Debtors infringe upon one or more of the Patents:
 - (a) Model Code: GMT 265; Car Brand and Name: Cadillac SRX

- (b) Model Code: GMT 360; Car and Brand Name: Chevrolet Trailblazer,GMC Envoy, Oldsmobile Bravada, Isuzu Ascender, Saab
- (c) Model Code: GMT 370; Car and Brand Name: Chevrolet Trailblazer XL,GMC Envoy XL
- (d) Model Code: GMX 295; Car and Brand Name: Cadillac STS
- (e) Model Code: GMT 191; Car and Brand Name: Chevrolet Equinox
- (f) Model Code: GMT 192; Car and Brand Name: Pontiac Torrent
- (g) Model Code: GMT 193; Car and Brand Name: Suzuki XL-7
- (h) Model Code: GMT 345; Car and Brand Name: Hummer H3
- 12. Several examples of the infringement are attached to this email. Exhibit 1 is a photograph of the side impact inflatable curtain airbag used in the GMC Envoy. This side impact inflatable curtain airbag has parallel cells and an extension piece which infringe upon US Patent 5,788,270 and US Patent 6,402,192.
- 13. Exhibit 2 is a photograph of the side impact inflatable curtain airbag used in the Suzuki XL-7. This side impact inflatable curtain airbag has parallel cells which infringe upon US Patent 5,788,270.
- 14. Exhibit 3 is a photograph of the side impact inflatable curtain airbags used in the Cadillac STS and Hummer H3. These side impact inflatable curtain airbags have points that are used to define cells which infringe upon US Patent 6,099,029.
- 15. Exhibit 4 is a photograph of the side impact inflatable curtain airbag used in the Pontiac Torrent. This side impact inflatable curtain airbag has cells that intersect the lower edge which infringe upon US Patent 6,494,480.

- 16. Exhibit 5 is a photograph of the side impact inflatable curtain airbag used in the Hummer H3. This side impact inflatable curtain airbag has a midfill which infringes upon US Patent 6,623,031.
- 17. The above listed exhibits are examples of some of the ways in which the Debtors have infringed upon the Patents and do not represent an all-inclusive list of the Debtors' infringement.
- 18. On December 11, 2009, Autoliv purchased the Delphi division that was infringing on the Patents.

STATE OF MICHIGAN)
) ss:
COUNTY OF OAKLAND)

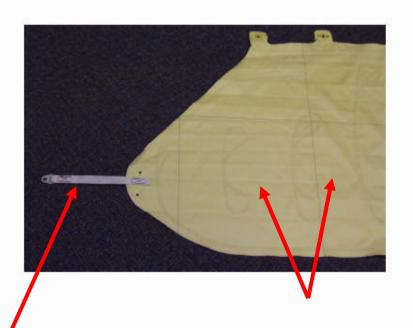
Dana Wold, being first duly sworn, deposes and states that he has read the foregoing Affidavit and knows the contents thereof; that the same is true of his own knowledge, except as to those matter therein stated to be upon information and belief, and as to those matters, he believes them to be true.

Dana Wold

The foregoing was sworn to and acknowledged before me this 12th day of May, 2010 by Dana Wold.

CANDACE MIERZWINSKI
Notary Public, State of Michigan
County of Oakland
My Commission Expires, May. 26, 2013
Acting in the County of

IC for GM 360 (Envoy) US





Extension Piece



Pictured: 2005 Envoy SLE

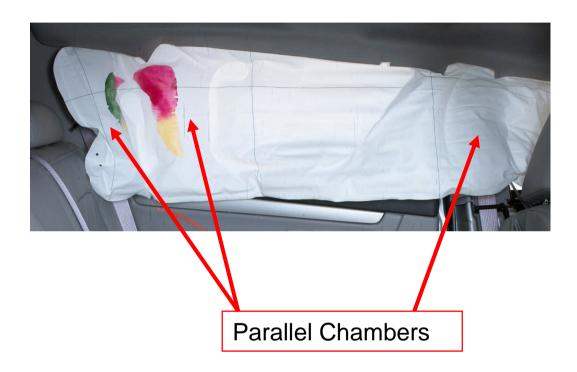
AUTOLIV-Patent Department/HK/ 8

PRIVATE/PROPRIETARY



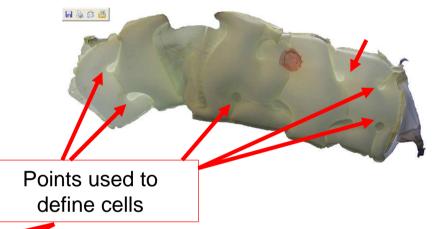


GMT193 Suzuki XL7





GMT345 Hummer H3

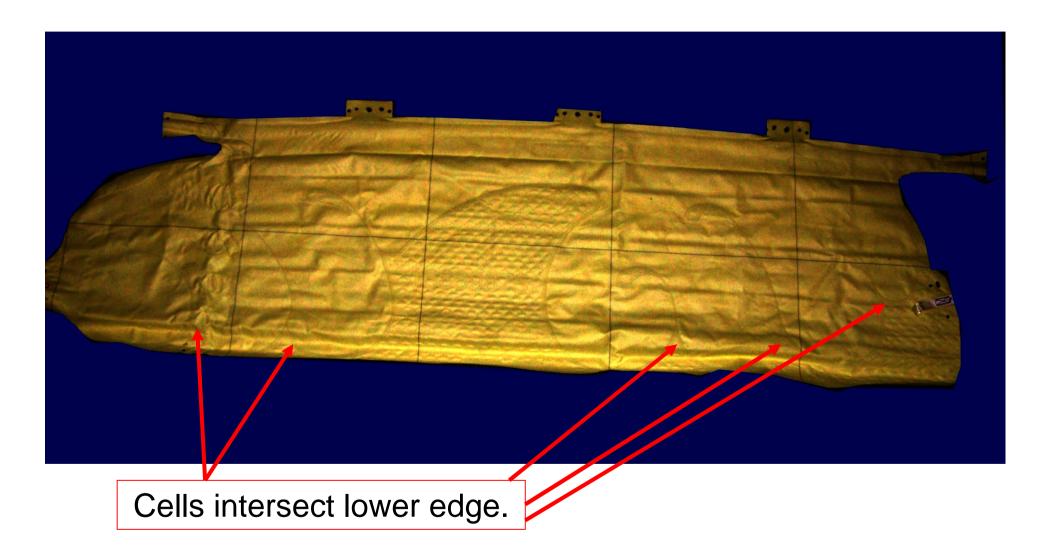


GMX295 Cadillac STS





Pontiac Torrent : GMT192





Hummer H3: GMT345

